

Watson,Bonnie F (CONTR) - PEH-1

From: Walkowiak, John <JWalkowiak@ci.tacoma.wa.us>
Sent: Wednesday, February 25, 2015 6:31 PM
To: Cobb,Carrie L (BPA) - PEH-1; Lewis,Margaret L (BPA) - PEJB-1
Cc: Bicker, Stephen; Stafford, Jeff
Subject: Comments on Revised Option for Allocating and Reporting Momentum Savings to Utilities

Good Evening Carrie and Margaret:

Tacoma Power's comments to the February 9th Revised Option for Allocating and Reporting Momentum Savings to Utilities:

- We are still not quite comfortable with the overall concept of Momentum aka non programmatic Savings for meeting Washington's 1937 reporting.
 - We have concerns with:
 - Possible reduction in cost-effective conservation activities and programs based on undocumented savings
 - Possible duplication of reported Momentum Savings with the savings now reported by NEEA and utility sponsored programs
- Specifically concerns on the Allocation and Reporting:
 - Washington 1937 utilities would need qualified documentation and methodology on how the amount of Momentum Savings was determined
 - Washington 1937 utilities would need an allocation report from BPA by May 1st and no later than May 15th for the previous calendar year to meet our 1937 reporting requirement by June 1st
 - Has the Washington Department of Commerce agreed that Momentum Savings meets the intent of Revised Code of Washington (RC) 19.285?
 - Has there been any communications with the Washington State Auditor (SAO) or has a third party SME reviewed the methodology that could be shared?

Thanks

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